



## NW Opportunity Partners CDC

Expanding affordable housing and economic opportunities in NW DC

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November 30, 2025

Mr. Anthony J. Hood, Chairman  
DC Zoning Commission  
One Judiciary Square  
441 4<sup>th</sup> Street NW, 2<sup>nd</sup> Floor  
Washington, DC 20001

ZC Case No. 25-09

Text & Map Amendments to Create the Cleveland Park Neighborhood Mixed Use Zone [NMU-8A/CP] & New Woodley Park Neighborhood Mixed Use Zone [NMU-9A/WP])

Dear Chairman Hood and Members of the Commission:

The NW Opportunity Partners Community Development Corporation (NWOPCDC) opposes the proposed map and text amendments for Cleveland Park and Woodley Park (Case 25-09) because they neither maximize the amounts of affordable housing nor target it to those most in need. As advocates for more affordable housing in Ward 3, we are particularly focused on the Inclusionary Zoning (IZ) provisions of the proposed upzonings.

The Rock Creek West Planning Area has been repeatedly designated as an area of high opportunity with high need for affordable housing.

- The Overview at the beginning of the Rock Creek West (RCW) Planning Area Element of the Comprehensive Plan identifies the area as “high opportunity” with “a substantial unmet need for new affordable units”. Stating that: “Increasing the production of affordable and moderate-income units in Rock Creek West is a priority.”
- The HANTA program recognizes RCW as an area of high need eligible for tax abatements for projects with one-third affordable housing.
- Ward 3 is the only Ward where the Mayor’s affordable housing goals have not been met.

The proposed changes in zoning present a rare opportunity to create greater economic and racial diversity in Ward 3 by maximizing inclusionary zoning in these special zones.

We anticipate that market rate housing rental rates in Cleveland Park and Woodley Park will remain high because of their exceptional access to public transportation, shopping, schools, libraries, parks, and neighborhood services. More housing is not likely to exceed demand or to lower rents. Therefore, high end market rate housing should “subsidize”/ offset greater amounts of affordable housing and lower levels of affordability.

To achieve a key purpose and intent of the text amendments—to ensure greater diversity through additional residential development, IZ Plus is insufficient. Therefore, we recommend the following:

1. Set the eligibility for IZ in these zones at 30% to 50% MFI. The Median Family Income (MFI) for black DC residents is less than 40% of area MFI. Therefore, IZ’s 60% MFI rental level is too high and should be changed to 30% to 50% in these special zones.
2. The IZ requirement should be 30% for the increased FAR. In many cases, there will be very significant increases in density in these new zones. This increased density is analogous to disposition of public land that requires 30% IZ in that both public land and the potential zoning envelope—in effect, air rights—are public assets. In addition, we would note that the HANTA program requires 33% IZ in exchange for tax abatements (akin to the benefit of the extra density). Regular IZ+ could apply to the existing FAR, with the 30% requirement applied to the increase.
3. The cap on IZ+ at 125% increases in density should be removed. Whatever the rationale for capping the density increase IZ at 125%, all bonus density should be included in the IZ requirements and continue to ladder up the IZ+ requirements above 125%.
4. The IZ requirements should encourage family sized units to address the critical shortage of larger units and to foster community cohesion and long-term tenancy.

The upzoning along Connecticut and Wisconsin Avenues are likely to be the best opportunities we will have for making significant progress in creating a Ward 3 that is more racially and economically diverse, and we urge the Zoning Commission to aggressively pursue housing equity in this case.

While housing displacement is not an issue in this case, we are concerned that small businesses will be displaced and unable to return because of the higher rents in taller buildings. In addition, we note that the lack of prescribed setbacks in the text is a great disservice to the existing community and nearby residents. The visuals presented to the neighbors that showed setbacks are now described as “illustrative”, but they were certainly not understood that way when they were presented. The zoning text should prescribe the minimum setbacks that the neighbors relied upon. HPRB can adjust them further, if needed.

Finally, we are opposed to the upzoning that creates Matter of Right densities essentially foreclosing any further community involvement in development projects, including ANCs and affected neighbors. We urge the Zoning Commission to condition building permits at higher densities under the new zoning on a process similar to a PUD to ensure that the public is not excluded from shaping their neighborhoods.

Carol F. Aten for  
NW Opportunity Partners CDC